Attorney Docket No.: ZIP00-01

REMARKS

U.S. Application No.: 09/715,641

In response to the Office Action mailed on March 29, 2004 Applicants respectfully request reconsideration. Claims 1-28 are now pending in this Application. Claims 1, 12, 14, 26, 27, 28 are independent claims and the remaining claims are dependent claims. In this Amendment, claim 2 has been amended. A version of the claims containing markings to show the changes made is included in the Appendix attached hereto. Applicants believe that the claims as presented are in condition for allowance. A notice to this affect is respectfully requested.

Claim 2 was rejected under 35 U.S.C. §112 based on lack of antecedent basis for the term "quota enforcement function." This term has been amended to "quota enforcement operation" as consistent with the antecedent basis for this term in claim 1 and thus this rejection has been overcome and should be withdrawn. This amendment has been made to correct antecedent basis only and is not intended to effect the scope of the claimed invention.

Claims 1-28 were rejected under both 35 U.S.C. §102(e) and 35 U.S.C. §103 based U.S. Patent 6,668,045 (Mow). 35 U.S.C. §102(e) states that

"A person shall be entitled to a patent unless the invention was described in an application for patent, published under section 122(b), by another filed in the United States *before* the invention by the applicant for patent..."

Applicant(s) respectfully note that Mow has a filing date of October 30, 2000. However, the claims pending in the present application are supported by the teachings and disclosure and claim the benefit of the filing date of U.S. Provisional Patent Application Serial No. 60/204,472 filed May 16, 2000, which is well before the filing date of Mow. As such, Mow is inapplicable as prior art to the present claimed invention and the claim rejections based on Mow are moot and should be withdrawn.

U.S. Application No.: <u>09/715,641</u> Attorney Docket No.: <u>ZIP00-01</u>

-16-

There is no government fee required for this amendment. If the U.S. Patent and Trademark Office deems a fee necessary, this fee may be charged to the account of the undersigned, Deposit Account No. <u>50-0901</u>.

If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned collect at (508) 366-9600, in Westborough, Massachusetts.

Respectfully submitted,

Barry W. Chapin, Esq. Attorney for Applicant(s) Registration No.: 39,934

CHAPIN & HUANG, L.L.C. Westborough Office Park 1700 West Park Drive

Westborough, Massachusetts 01581

Telephone: (508) 366-9600 Facsimile: (508) 616-9805 Customer No.: 022468

Attorney Docket No.: ZIP00-01

Dated: <u>July 16, 2004</u>